

Exhibit F

W. R. Grace Asbestos Personal Injury Questionnaire



10315607075322

RE: ?

Michael B Serling, P C
280 N Woodward, Suite
Birmingham MI 48009

REDACTED

REC'D FEB 20 2006



000729075322



[THIS PAGE INTENTIONALLY LEFT BLANK.]



IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:) Chapter 11
W. R. GRACE & CO., et al.,) Case No. 01-01139 (JKF)
Debtors.) Jointly Administered
)
)

W. R. Grace Asbestos Personal Injury Questionnaire

YOU HAVE RECEIVED THIS QUESTIONNAIRE BECAUSE GRACE BELIEVES THAT YOU HAD SUED ONE OR MORE OF THE DEBTORS LISTED IN APPENDIX A ATTACHED TO THIS QUESTIONNAIRE BEFORE GRACE FILED FOR BANKRUPTCY ON APRIL 2, 2001 FOR AN ASBESTOS-RELATED PERSONAL INJURY OR WRONGFUL DEATH CLAIM, AND THAT CLAIM WAS NOT FULLY RESOLVED.

IF YOU HAVE SUCH A CLAIM, YOU MUST COMPLETE AND SUBMIT THIS QUESTIONNAIRE BY JANUARY 12, 2006 TO RUST CONSULTING, INC., THE CLAIMS PROCESSING AGENT, AT ONE OF THE FOLLOWING ADDRESSES:

IF SENT BY U.S. MAIL

RUST CONSULTING, INC.
CLAIMS PROCESSING AGENT
RE: W.R. GRACE & CO. BANKRUPTCY
P.O. BOX 1620
FARIBAULT, MN 55021

IF SENT BY FEDERAL EXPRESS, UNITED PARCEL
SERVICE, OR A SIMILAR HAND DELIVERY SERVICE

RUST CONSULTING, INC.
CLAIMS PROCESSING AGENT
RE: W.R. GRACE & CO. BANKRUPTCY
201 S. LYNDAL AVE.
FARIBAULT, MN 55021

A QUESTIONNAIRE (AND ANY AMENDMENTS OR ADDITIONAL DOCUMENTS IN SUPPORT OF THE QUESTIONNAIRE) WILL NOT BE CONSIDERED UNLESS RECEIVED BY RUST CONSULTING, INC. BY JANUARY 12, 2006.

THIS QUESTIONNAIRE IS AN OFFICIAL DOCUMENT APPROVED BY THE COURT IN CONNECTION WITH ESTIMATING GRACE'S ASBESTOS-RELATED PERSONAL INJURY AND WRONGFUL DEATH CLAIMS AS A WHOLE. THE QUESTIONNAIRE IS BEING USED BY W. R. GRACE AS A MEANS TO SEEK INFORMATION ABOUT YOUR ASBESTOS CLAIM. BY TIMELY RETURNING THE QUESTIONNAIRE AS COMPLETELY AND ACCURATELY AS POSSIBLE, GRACE, THE OFFICIAL COMMITTEES, AND THE FUTURE CLAIMANTS REPRESENTATIVE WILL SEEK TO PRIORITIZE THE PROCESSING OF YOUR CLAIM UNDER ANY TRUST DISTRIBUTION PROCEDURES APPROVED AS PART OF A PLAN OF REORGANIZATION.

THE COURT HAS ORDERED THAT, AS PART OF THE DISCOVERY PROCESS, ALL HOLDERS OF PRE-PETITION ASBESTOS PERSONAL INJURY CLAIMS MUST COMPLETE AND RETURN THIS QUESTIONNAIRE. THUS, FAILURE TO TIMELY RETURN THE QUESTIONNAIRE AS COMPLETELY AND ACCURATELY AS POSSIBLE MAY RESULT IN SANCTIONS AND/OR OTHER RELIEF AVAILABLE UNDER APPLICABLE FEDERAL RULES.

BECAUSE YOUR CLAIM WILL BE EVALUATED IN ACCORDANCE WITH THE TRUST DISTRIBUTION PROCEDURES APPROVED AS PART OF A PLAN OF REORGANIZATION, COMPLETION OF THIS QUESTIONNAIRE DOES NOT MEAN THAT YOUR CLAIM WILL EITHER BE ALLOWED OR PAID. TO THE EXTENT YOU ATTACH TO THIS QUESTIONNAIRE DOCUMENTS ALSO NEEDED BY THE TRUST TO PROCESS YOUR CLAIM, SUCH DOCUMENTS WILL BE PROVIDED TO THE TRUST AND YOU WILL NOT NEED TO RESUBMIT THEM.



INSTRUCTIONS

A. GENERAL

1. This Questionnaire refers to any lawsuit that you filed before April 2, 2001 for an "asbestos-related personal injury or wrongful death claim." This term is intended to cover any lawsuit alleging any claim for personal injuries or damages that relates to: (a) exposure to any products or materials containing asbestos that were manufactured, sold, supplied, produced, specified, selected, distributed or in any way marketed by one or more of the Debtors (or any of their respective past or present affiliates, or any of the predecessors of any of the Debtors or any of their respective past or present affiliates), or (b) exposure to vermiculite mined, milled or processed by the Debtors (or any of their respective past or present affiliates, any of the predecessors of any of the Debtors or any of their predecessors' respective past or present affiliates). It includes claims in the nature of or sounding in tort, or under contract, warranty, guarantee, contribution, joint and several liability, subrogation, reimbursement, or indemnity, or any other theory of law or equity, or admiralty for, relating to, or arising out of, resulting from, or attributable to, directly or indirectly, death, bodily injury, sickness, disease, or other personal injuries or other damages caused, or allegedly caused, directly or indirectly, and arising or allegedly arising, directly or indirectly, from acts or omissions of one or more of the Debtors. It includes all such claims, debts, obligations or liabilities for compensatory damages such as loss of consortium, personal or bodily injury (whether physical, emotional or otherwise), wrongful death, survivorship, proximate, consequential, general, special, and punitive damages.
2. Your Questionnaire will be deemed filed only when it has been received by Rust Consulting Inc., the Claims Processing Agent, via U.S. Mail, Federal Express, United Parcel Service or a similar hand delivery service. A Questionnaire that is submitted by facsimile, telecopy or other electronic transmission will not be accepted and will not be deemed filed.

Do not send any Questionnaire to the Debtors, counsel for the Debtors, the Future Claimants Representative, the Official Committee of Unsecured Creditors, the Official Committee of Asbestos Personal Injury Claimants, the Official Committee of Asbestos Property Damage Claimants, the Official Committee of Equity Security Holders, or such Committees' counsel. Questionnaires that are filed with or sent to anyone other than Rust Consulting, Inc. will be deemed not to have been submitted, and such Questionnaires will not be considered.
3. Your completed Questionnaire must (i) be written in English, and (ii) attach relevant supporting materials as instructed further below.
4. All holders of claims described on page i (and as described in further detail in Instruction A (1) above) are required to file this Questionnaire by Jan. 12, 2006. Your Questionnaire will be used in connection with the estimation hearing to be conducted by the Court pursuant to the Estimation Procedures Order (a copy of which is attached as Appendix B).
5. Any subsequent amendment to the Questionnaire will not be considered for any purpose unless received by Jan. 12, 2006.

B. PART I -- Identity of Injured Person and Legal Counsel

Respond to all applicable questions. If you are represented by a lawyer, then in Part I (b), please provide your lawyer's name and the name, telephone number and address of his/her firm. If you are represented by a lawyer, he/she must assist in the completion of this Questionnaire. Also, if you would prefer that the Debtors send any additional materials only to your lawyer, instead of sending such materials to you, then check the box indicating this in Part I (b).

All references to "you" or the like in Parts I through X shall mean the injured person. If the injured person is deceased, then the executor of the person's will (or similar estate representative) must complete this Questionnaire.

C. PART II -- Asbestos-Related Condition(s)

Please indicate all asbestos-related medical conditions for which you have been diagnosed. To complete questions related to injuries, medical diagnoses, and/or conditions, please use the following categories of customarily diagnosed conditions:

- Mesothelioma
- Asbestos-Related Lung Cancer
- Other Cancer (colon, laryngeal, esophageal, pharyngeal, or stomach)
- Clinically Severe Asbestosis
- Asbestosis
- Other Asbestos Disease

If you have been diagnosed with multiple conditions and/or if you received diagnoses and diagnostic tests relating to the same condition by multiple doctors, please complete a separate Part II for each initial diagnosis and any previous or subsequent diagnoses or diagnostic tests that change or conflict with the initial diagnosis. For your convenience, additional copies of Part II are attached as Appendix C to this Questionnaire.

Supporting Documents for Diagnosis: This Questionnaire must be accompanied by copies, with access to originals upon request, of any and all documents you, your counsel, or your doctors have or subsequently obtain that support or conflict with your diagnosis.

X-rays and B-reads: Please attach all x-ray readings and reports. You may, but are not required to, attach chest x-rays. The court, however, has ruled that Grace may seek access to chest x-rays upon request.

Pulmonary Function Tests: Please attach all pulmonary function test results, including the actual raw data and all spirometric tracings, on which the results are based.

**D. PART III – Direct Exposure to Grace Asbestos-Containing Products**

In Part III, please provide the requested information for the job and site at which you were exposed to Grace asbestos-containing products. Indicate the dates of exposure to each Grace asbestos-containing product. If your exposure was a result of your employment, use the list of occupation and industry codes below to indicate your occupation and the industry in which you worked at each site. If you allege exposure to Grace asbestos-containing products at multiple sites, the Court has ordered that you must complete a separate Part III for each site. For your convenience, additional copies of Part III are attached as Appendix D to this Questionnaire.

Attach copies of any and all documents establishing that exposure to Grace asbestos-containing products had a substantial causal role in the development of the disease.

Occupation Codes

- | | |
|--|---|
| 01. Air conditioning and heating installer/maintenance | 31. Iron worker |
| 02. Asbestos miner | 32. Joiner |
| 03. Asbestos plant worker/asbestos manufacturing worker | 33. Laborer |
| 04. Asbestos removal/abatement | 34. Longshoreman |
| 05. Asbestos sprayer/spray gun mechanic | 35. Machinist/machine operator |
| 06. Assembly line/factory/plant worker | 36. Millwright/mill worker |
| 07. Auto mechanic/bodywork/brake repairman | 37. Mixer/bagger |
| 08. Boilermaker | 38. Non-asbestos miner |
| 09. Boiler repairman | 39. Non-occupational/residential |
| 10. Boiler worker/cleaner/inspector/engineer/installer | 40. Painter |
| 11. Building maintenance/building superintendent | 41. Pipefitter |
| 12. Brake manufacturer/installer | 42. Plasterer |
| 13. Brick mason/layer/hod carrier | 43. Plumber - install/repair |
| 14. Burner operator | 44. Power plant operator |
| 15. Carpenter/woodworker/cabinetmaker | 45. Professional (e.g., accountant, architect, physician) |
| 16. Chipper | 46. Railroad worker/carman/brakeman/machinist/conductor |
| 17. Clerical/office worker | 47. Refinery worker |
| 18. Construction - general | 48. Remover/installer of gaskets |
| 19. Custodian/janitor in office/residential building | 49. Rigger/stevedore/seaman |
| 20. Custodian/janitor in plant/manufacturing facility | 50. Rubber/tire worker |
| 21. Electrician/inspector/worker | 51. Sandblaster |
| 22. Engineer | 52. Sheet metal worker/sheet metal mechanic |
| 23. Firefighter | 53. Shipfitter/shipwright/ship builder |
| 24. Fireman | 54. Shipyard worker (md. repair, maintenance) |
| 25. Flooring installer/tile installer/tile mechanic | 55. Steamfitter |
| 26. Foundry worker | 56. Steelworker |
| 27. Furnace worker/repairman/installer | 57. Warehouse worker |
| 28. Glass worker | 58. Welder/blacksmith |
| 29. Heavy equipment operator (includes truck, forklift, & crane) | 59. Other |
| 30. Insulator | |

Industry Codes

- | | |
|--|--|
| 001. Asbestos abatement/removal | 109. Petrochemical |
| 002. Aerospace/aviation | 110. Railroad |
| 100. Asbestos mining | 111. Shipyard-construction/repair |
| 101. Automotive | 112. Textile |
| 102. Chemical | 113. Tire/rubber |
| 103. Construction trades | 114. U.S. Navy |
| 104. Iron/steel | 115. Utilities |
| 105. Longshore | 116. Grace asbestos manufacture or milling |
| 106. Maritime | 117. Non-Grace asbestos manufacture or milling |
| 107. Military (other than U.S. Navy) | 118. Other |
| 108. Non-asbestos products manufacturing | |



E. PART IV -- Indirect Exposure to Grace Asbestos-Containing Products

In Part IV, please provide the information requested for any injury alleged to have been caused by exposure to Grace asbestos-containing products through contact/proximity with another injured person. If you allege exposure through contact/proximity with multiple injured persons, please complete a separate Part IV for each injured person. For your convenience, additional copies of Part IV are attached as Appendix E to this Questionnaire.

F. PART V -- Exposure to Non-Grace Asbestos-Containing Products

In Part V, please provide the requested information for each party against which you have filed a lawsuit and/or claim alleging exposure to asbestos-containing products other than Grace products. If you filed such lawsuits and/or claims against multiple parties, the Court has ordered that you must complete a separate Part V for each party. If exposure was in connection with your employment, use the list of occupation and industry codes in Part III to indicate your occupation and the industry in which you worked. For your convenience, additional copies of Part V are attached as Appendix F to this Questionnaire.

G. PART VI -- Employment History

In Part VI, please provide the information requested for each industrial job you have held, other than jobs already listed in Parts III or V. Use the list of occupation and industry codes in the instructions to Part III to indicate your occupation and the industry in which you worked for each job. Please use the copy of Part VI attached as Appendix G to this Questionnaire if additional space is needed.

H. PART VII -- Litigation and Claims Regarding Asbestos and/or Silica

In Part VII, please describe any lawsuits and/or claims that were filed by you or on your behalf regarding asbestos or silica.

I. PART VIII -- Claims by Dependents or Related Persons

Part VIII is to be completed only by dependents or related persons (such as spouse or child) of an injured person who sued the Debtors before April 2, 2001 for an asbestos-related personal injury or wrongful death claim against Grace not involving physical injury to him/herself on account of his/her own exposure. One example of such a claim would be a claim for loss of consortium. If you are asserting such a claim, complete the entire Questionnaire, providing all information and documentation regarding the injured person.

J. PART IX -- Supporting Documentation

In Part IX, please mark the boxes next to each type of document that you are submitting with this Questionnaire. As indicated in the instructions to Parts II and III, this Questionnaire must be accompanied by copies, with access to originals upon request, of any and all documents you, your counsel, or your doctors have or subsequently obtain that (a) support or conflict with your diagnosis and/or (b) establish exposure to Grace asbestos-containing products as having a substantial causal role in the development of the medical diagnoses, and/or conditions claimed. Original documents provided to Grace will be returned within a reasonable time after its professionals and experts have reviewed the documents.

Grace will reimburse your reasonable expenses incurred in providing (a) copies of depositions you have given in lawsuits in which Grace was not a party and/or (b) any documents you have previously provided to Grace in prior litigation. Please indicate the documents for which you are seeking reimbursement and attach a receipt for such cost.

K. PART X -- Attestation that Information is True, Accurate and Complete

By signing Part X, you, the injured person, are attesting and swearing, under penalty of perjury, that, to the best of your knowledge, all of the information in this Questionnaire is true, accurate and complete. If the injured person is deceased, then the executor of the person's will (or similar estate representative) must complete and sign Part X on behalf of the injured person.

The legal representative of the injured person must complete and sign Part X where indicated.

WR GRACE-PIQ 005235-007

Claimant objects to this Questionnaire for multiple reasons. The questionnaire is unduly burdensome especially given the time frame in which claimant is required to answer. Much of the information requested is equally accessible to WR Grace and claimant is being requested in many instances to compile, categorize and summarize information from documents that WR Grace can analyze as readily as claimant. The request for information includes detailed requests for discovery information normally obtained as part of a discovery process in the underlying state court action, but claimant has been precluded from obtaining individual discovery against WR Grace by virtue of the bankruptcy stay. As such, the discovery requests violate claimant's fundamental due process rights and, if used in any fashion to determine the merits of the claim itself, claimant's right to a trial by jury. Parts of the information requested are privileged and confidential. Without waiving these objections, claimant is responding to this Questionnaire for the purposes indicated in the Preface to the Questionnaire, i.e. "...GRACE, THE OFFICIAL COMMITTEES, AND THE FUTURE CLAIMANTS REPRESENTATIVE WILL SEEK TO PRIORITIZE THE PROCESSING OF YOUR CLAIM UNDER ANY TRUST DISTRIBUTION PROCEDURES APPROVED AS PART OF A PLAN OF REORGANIZATION." Claimant objects to the use of this information for any reason to deny the merits of the claim and specifically limits the use of the information to "...prioritize" the claim as represented in the Questionnaire.

- b. LAWYER'S NAME AND FIRM**

1. Name of Lawyer: Michael B. Serling
2. Name of Law Firm With Which Lawyer is Affiliated: Michael B. Serling, P.C.
3. Mailing Address of Firm: 280 N. Old Woodward Ave., Suite 406, Birmingham, MI 48009
- | | | | |
|---------|------|----------------|-----------------|
| Address | City | State/Province | Zip/Postal Code |
|---------|------|----------------|-----------------|
4. Law Firm's Telephone Number or Lawyer's Direct Line: (248) 647-6966
- ☒ Check this box if you would like the Debtors to send subsequent material relating to your claim to your lawyer, in lieu of sending such materials to you.

c. CAUSE OF DEATH (IF APPLICABLE)

1. Is the injured person living or deceased? ☒ Living ☐ Deceased
If deceased, date of death:..... N/A
- 2.If the injured person is deceased, then attach a copy of the death certification to this Questionnaire and complete the following:

Objection for the reason that a death certificate is a public document equally accessible to both claimant and WR Grace.
Without waiving the objection, a copy of the death certificate, if any, in claimant's possession has been attached. Claimant further objects to the questions below for the reason that the information requested below is listed in the death certificate and claimant refers WR Grace to the death certificate itself for the exact language.

Primary Cause of Death (as stated in the Death Certificate): _____

Contributing Cause of Death (as stated in the Death Certificate): _____



PART II: ASBESTOS-RELATED CONDITION(S)

Mark the box next to the conditions with which you have been diagnosed and provide all information required in the instructions to this Questionnaire. If you have been diagnosed with multiple conditions and/or if you received diagnoses and diagnostic tests relating to the same condition by multiple doctors, please complete a separate Part II for each initial diagnosis and any previous or subsequent diagnoses or diagnostic tests that change or conflict with the initial diagnosis. For your convenience, additional copies of Part II are attached as Appendix C to this Questionnaire.

1. Please check the box next to the condition being alleged: ASB

- | | |
|---|---|
| <input type="checkbox"/> Asbestos-Related Lung Cancer | <input type="checkbox"/> Mesothelioma |
| <input checked="" type="checkbox"/> Asbestosis | <input type="checkbox"/> Other Cancer (cancer not related to lung cancer or mesothelioma) |
| <input type="checkbox"/> Other Asbestos Disease | <input type="checkbox"/> Clinically Severe Asbestosis |

- a. **Mesothelioma:** If alleging Mesothelioma, were you diagnosed with malignant mesothelioma based on the following (check all that apply):

Objection for the reason that claimant does not have individual knowledge of whether the pathologist(s) who initially diagnosed mesothelioma were or were not board certified. Claimant assumes such pathologist(s) was board certified and is answering the question based upon that assumption. Claimant is informed and believes that pathologists consulted by claimant's law firm are all board certified. Claimant further objects for the reason that board certifications are equally accessible to WR Grace through national boards of registry. Without waiving the objections, claimants have attached medical reports and records concerning the diagnosis of mesothelioma presently in claimant's possession and refers WR Grace to the medical records for the identity of the pathologists. Provided, however, that claimant further objects for the reason that this case has not been set for trial as to W.R. Grace and thus a full trial workup may not have been completed as to W.R. Grace. The discovery request is untimely under applicable state law and may not reflect the totality of evidence to be adduced against W.R. Grace at trial.

- ☐ diagnosis from a pathologist certified by the American Board of Pathology
- ☐ diagnosis from a second pathologist certified by the American Board of Pathology
- ☐ diagnosis and documentation supporting exposure to Grace asbestos-containing products having a substantial causal role in the development of the condition
- ☐ other (please specify): _____



WR GRACE-PIQ 005235-009

PART II: ASBESTOS-RELATED CONDITION(S) (Continued)

- a. **Asbestos-Related Lung Cancer:** If alleging Asbestos-Related Lung Cancer, were you diagnosed with primary lung cancer based on the following (check all that apply):

Claimant objects for the reason that the information requested below is equally obtainable by WR Grace from the medical records which claimant has attached concerning the diagnosis of claimant's lung cancer and claimant refers WR Grace to the attached medical records. Claimant also objects because it would be unduly burdensome to require claimant to reproduce the information in summary form when it is readily available from the attached medical records and reports. Claimant further objects because this case has not yet been set for trial as to WR Grace and full trial workup as to WR Grace may not yet have been completed. WR Grace's discovery request is therefore untimely under applicable state law and may not reflect the evidence to be adduced against WR Grace at trial.

- ☐ findings by a pathologist certified by the American Board of Pathology
- ☐ evidence of asbestosis based on a chest x-ray reading of at least 1/1 on the ILO grade scale (a) conducted in compliance with the standards set forth in the International Labour Organization's *2000 International Classification of Radiographs of Pneumoconioses* and (b) by a B-reader certified by the National Institute for Occupational Safety and Health
- ☐ evidence of asbestosis based on a chest x-ray reading of at least 1/1 on the ILO grade scale (a) conducted in compliance with the standards set forth in the International Labour Organization's *2000 International Classification of Radiographs of Pneumoconioses* and (b) by a second B-reader certified by the National Institute for Occupational Safety and Health
- ☐ evidence of asbestosis determined by pathology
- ☐ evidence of asbestos-related nonmalignant disease based on a chest x-ray reading of at least 1/0 on the ILO grade scale (a) conducted in compliance with the standards set forth in the International Labour Organization's *2000 International Classification of Radiographs of Pneumoconioses* and (b) by a B-reader certified by the National Institute for Occupational Safety and Health
- ☐ evidence of asbestos-related nonmalignant disease based on a chest x-ray reading of at least 1/0 on the ILO grade scale (a) conducted in compliance with the standards set forth in the International Labour Organization's *2000 International Classification of Radiographs of Pneumoconioses* and (b) by a second B-reader certified by the National Institute for Occupational Safety and Health
- ☐ diffuse pleural thickening as defined in the International Labour Organization's *Guidelines for the Use of the ILO International Classification of Radiographs and Pneumoconioses* (2000)
- ☐ a supporting medical diagnosis and supporting documentation establishing that exposure to Grace asbestos-containing products had a substantial causal role in the development of the lung cancer
- ☒ other (please specify): See attached medical records and reports

c. **Other Cancer:**

Claimant objects to the questions below for the reason that the information requested is equally accessible from the medical records which claimant has attached concerning the diagnosis of claimant's cancer and claimant refers WR Grace to the attached medical records and reports. Claimant also objects for the reason that it is unduly burdensome to require claimant to reproduce in summary form information which is readily obtainable from the attached reports and records. Claimant further objects because this case has not yet been set for trial as to WR Grace and full trial workup as to WR Grace may not yet have been completed. WR Grace's discovery request is therefore untimely under applicable state law and may not reflect the evidence to be adduced against WR Grace at trial.

- (i) If alleging Other Cancer, please mark the box(es) next to the applicable primary cancer(s) being alleged:
- ☐ colon ☐ pharyngeal ☐ esophageal ☐ laryngeal ☐ stomach cancer
- ☒ other, please specify: See attached medical records and reports

- (ii) Were you diagnosed with the above-indicated cancer based on the following (check all that apply):

- ☐ findings by a pathologist certified by the American Board of Pathology



- ☐ evidence of asbestosis based on a chest x-ray reading of at least 1/1 on the ILO grade scale (a) conducted in compliance with the standards set forth in the International Labour Organization's *2000 International Classification of Radiographs of Pneumoconioses* and (b) by a B-reader certified by the National Institute for Occupational Safety and Health
- ☐ evidence of asbestosis based on a chest x-ray reading of at least 1/1 on the ILO grade scale (a) conducted in compliance with the standards set forth in the International Labour Organization's *2000 International Classification of Radiographs of Pneumoconioses* and (b) by a second B-reader certified by the National Institute for Occupational Safety and Health
- ☐ evidence of asbestosis determined by pathology
- ☐ a supporting medical diagnosis and supporting documentation establishing that exposure to Grace asbestos-containing products had a substantial causal role in the development of the cancer
- ☒ other (please specify): See attached medical records and reports



PART II: ASBESTOS-RELATED CONDITION(S) (Continued)

- a. **Clinically Severe Asbestosis:** If alleging Clinically Severe Asbestosis, was your diagnosis based on the following (check all that apply):

Claimant objects for the reason that the information requested below is equally accessible to WR Grace from the attached medical records and reports and claimant refers WR Grace to the attached medical records and reports. Claimant also objects for the reason that it is unduly burdensome to require claimant to reproduce in summary form information which is readily obtainable from the attached reports and records.

In further response, claimant does not have individual knowledge of whether all pulmonologists or internists involved in claimant's diagnosis or treatment are board certified, and objects for the reason that such information is equally accessible to WR Grace through national boards of registry. Claimant is informed and believes, however, that all pulmonologists or internists consulted by claimant's law firm are board certified. Claimant further objects because this case has not yet been set for trial as to WR Grace and full trial workup as to WR Grace may not yet have been completed. WR Grace's discovery request is therefore untimely under applicable state law and may not reflect the evidence to be adduced against WR Grace at trial.

- ☐ diagnosis of a pulmonologist or internist certified by the American Board of Internal Medicine
- ☐ a chest x-ray reading of at least 2/1 on the ILO grade scale (a) conducted in compliance with the standards set forth in the International Labour Organization's *2000 International Classification of Radiographs of Pneumoconioses* and (b) by a B-reader certified by the National Institute for Occupational Safety and Health
- ☐ a chest x-ray reading of at least 2/1 on the ILO grade scale (a) conducted in compliance with the standards set forth in the International Labour Organization's *2000 International Classification of Radiographs of Pneumoconioses* and (b) by a second B-reader certified by the National Institute for Occupational Safety and Health
- ☐ asbestosis determined by pathology
- ☐ a pulmonary function test, conducted in accordance with the standards set forth in the American Thoracic Society's *Lung Function Testing; Selection of Reference Values and Interpretive Strategies*, demonstrating total lung capacity less than 65% predicted
- ☐ a pulmonary function test, conducted in accordance with the standards set forth in the American Thoracic Society's *Lung Function Testing; Selection of Reference Values and Interpretive Strategies*, demonstrating forced vital capacity less than 65% predicted and a FEV1/FVC ratio greater than or equal to 65% predicted
- ☐ a supporting medical diagnosis and supporting documentation establishing that exposure to Grace asbestos-containing products had a substantial causal role in the development of the asbestosis
- ☒ other (please specify): See attached medical records and reports

- b. **Asbestosis:** If alleging Asbestosis, was your diagnosis based on the following (check all that apply):

Claimant objects for the reason that the information requested below is equally accessible to WR Grace from the attached medical records and reports and claimant refers WR Grace to the attached medical records and reports. Additionally, it would be unduly burdensome to require that claimant's reproduce in summary form the evidence which is readily obtainable from the attached records. In further response, claimant does not have individual knowledge of whether all pulmonologists or internists involved in claimant's diagnosis or treatment are board certified, and objects for the reason that such information is equally accessible to WR Grace through national boards of registry. Claimant is informed and believes, however, that all pulmonologists or internists consulted by claimant's law firm are board certified. Claimant further objects because this case has not yet been set for trial as to WR Grace and full trial workup as to WR Grace may not yet have been completed. WR Grace's discovery request is therefore untimely under applicable state law and may not reflect the evidence to be adduced against WR Grace at trial.

- ☐ diagnosis of a pulmonologist or internist certified by the American Board of Internal Medicine
- ☐ a chest x-ray reading conducted in compliance with the standards set forth in the International Labour Organization's *2000 International Classification of Radiographs of Pneumoconioses* by a B-reader certified by the National Institute for Occupational Safety and Health, with one of the following: (i) at least 1/0 on the ILO grade scale, or (ii) diffuse pleural



thickening as defined in the ILO's *Guidelines for the Use of the ILO International Classification of Radiographs and Pneumoconioses* (2000)

- ☐ a chest x-ray reading conducted in compliance with the standards set forth in the International Labour Organization's *2000 International Classification of Radiographs of Pneumoconioses* by a second B-reader certified by the National Institute for Occupational Safety and Health, with one of the following: (i) at least 1/0 on the ILO grade scale, or (ii) diffuse pleural thickening as defined in the ILO's *Guidelines for the Use of the ILO International Classification of Radiographs and Pneumoconioses* (2000)
- ☐ asbestosis determined by pathology
- ☐ a pulmonary function test, conducted in accordance with the standards set forth in the American Thoracic Society's *Lung Function Testing; Selection of Reference Values and Interpretive Strategies*, demonstrating a FEV1/FVC ratio greater than or equal to 65% predicted with either (a) total lung capacity less than 80% predicted or (b) forced vital capacity less than 80% predicted
- ☐ a supporting medical diagnosis and supporting documentation establishing that exposure to Grace asbestos-containing products had a substantial causal role in the development of the asbestosis
- ☒ other (please specify): See attached medical records and reports



PART II: ASBESTOS-RELATED CONDITION(S) (Continued)

- a. **Other Asbestos Disease:** If alleging any asbestos-related injuries, medical diagnoses, and/or conditions other than those above, was your diagnosis based on the following (check all that apply):

Claimant objects for the reason that the information requested below is equally accessible to WR Grace from the attached medical records and reports and claimant refers WR Grace to the attached medical records and reports. Additionally, it would be unduly burdensome to require claimant to reproduce in summary form the evidence which is readily obtainable from the attached medical records. In further response, claimant does not have individual knowledge of whether all pulmonologists or internists involved in claimant's diagnosis or treatment are board certified, and objects for the reason that such information is equally accessible to WR Grace through national boards of registry. Claimant is informed and believes, however, that all pulmonologists or internists consulted by claimant's law firm are board certified. Claimant further objects because this case has not yet been set for trial as to WR Grace and full trial workup as to WR Grace may not yet have been completed. WR Grace's discovery request is therefore untimely under applicable state law and may not reflect the evidence to be adduced against WR Grace at trial.

- ☐ diagnosis of a pulmonologist or internist certified by the American Board of Internal Medicine
- ☐ diagnosis determined by pathology
- ☐ a chest x-ray reading conducted in compliance with the standards set forth in the International Labour Organization's 2000 *International Classification of Radiographs of Pneumoconioses* by a B-reader certified by the National Institute for Occupational Safety and Health, with one of the following: (i) at least 1/0 on the ILO grade scale, or (ii) diffuse pleural thickening as defined in the ILO's *Guidelines for the Use of the ILO International Classification of Radiographs and Pneumoconioses* (2000)
- ☐ a chest x-ray reading conducted in compliance with the standards set forth in the International Labour Organization's 2000 *International Classification of Radiographs of Pneumoconioses* by a second B-reader certified by the National Institute for Occupational Safety and Health, with one of the following: (i) at least 1/0 on the ILO grade scale, or (ii) diffuse pleural thickening as defined in the ILO's *Guidelines for the Use of the ILO International Classification of Radiographs and Pneumoconioses* (2000)
- ☐ a chest x-ray reading other than those described above
- ☐ a pulmonary function test, conducted in accordance with the standards set forth in the American Thoracic Society's *Lung Function Testing; Selection of Reference Values and Interpretive Strategies*, demonstrating a FEV1/FVC ratio greater than or equal to 65% predicted with either (a) total lung capacity less than 80% predicted or (b) forced vital capacity less than 80% predicted
- ☐ a pulmonary function test other than that discussed above
- ☐ a supporting medical diagnosis and supporting documentation establishing that exposure to Grace asbestos-containing products had a substantial causal role in the development of the condition
- ☐ a CT Scan or similar testing
- ☐ a diagnosis other than those above
- ☒ other (please specify): See attached medical records and reports

[REMAINDER OF PAGE INTENTIONALLY BLANK]

**PART II: ASBESTOS-RELATED CONDITION(S) (Continued)****2. Information Regarding Diagnosis**

Claimant objects for the reason that the information requested below is equally accessible to WR Grace from the attached medical records and reports and claimant refers WR Grace to the attached medical records and reports. Claimant also objects because it would be unduly burdensome to require claimant to reproduce the information in summary fashion which is readily contained in the attached medical reports. Claimant further objects because this case has not yet been set for trial as to WR Grace and full trial workup as to WR Grace may not yet have been completed. WR Grace's discovery request is therefore untimely under applicable state law and may not reflect the evidence to be adduced against WR Grace at trial.

Date of Diagnosis: 7/15/1999

Diagnosing Doctor's Name:

Diagnosing Doctor's Specialty:

Diagnosing Doctor's Mailing Address:
Address

City State/Province Zip/Postal Code

Diagnosing Doctor's Daytime Telephone Number: () -

With respect to your relationship to the diagnosing doctor, check all applicable boxes:

Was the diagnosing doctor your personal physician? ☒ Yes ☐ No

Claimant objects to the term "personal physician" for the reason that it is vague. Without waiving the objection, claimant interprets "personal" to mean a physician who reviewed information personal to claimant, and claimant asserts that the physicians who found asbestos-related disease in claimant reviewed personal information concerning claimant. Claimant has attached copies of medical reports and records, and claimant refers WR Grace to such records to determine the nature of the relationship.

Was the diagnosing doctor paid for the diagnostic services that he/she performed? ☒ Yes ☐ No

If yes, please indicate who paid for the services performed: Claimant has responsibility for payment for all services. If medical consultation was provided in connection with claimant's legal claim, the costs of such services are normally advanced by claimant's law firm and deducted from any settlements received

Did you retain counsel in order to receive any of the services performed by the diagnosing doctor? ☐ Yes ☐ No

Claimant objects for the reason that information concerning the attorney/client relationship is privileged.

Was the diagnosing doctor referred to you by counsel? ☐ Yes ☐ No

See the attached medical reports and records.

Are you aware of any relationship between the diagnosing doctor and your legal counsel? ☐ Yes ☒ No

If yes, please explain:

Claimant objects for the reason that the identity of the medical doctors is disclosed in the attached medical reports or records and claimant refers WR Grace to such records. WR Grace has equal accessibility to the national registries which list board certifications for medical providers. Claimant is informed and believes that medical providers consulted by claimant's counsel are board certified in their appropriate fields. Claimant does not have personal knowledge concerning medical providers not consulted by counsel, but assumes this knowledge is accessible to WR Grace from the appropriate certification entities.

Claimant refers WR Grace to the attached medical reports or records to determine if the medical doctor performed a physical examination. Claimant further objects because this case has not yet been set for trial as to WR Grace and full trial workup as to WR Grace may not yet have been completed. WR Grace's discovery request is therefore untimely under applicable state law and may not reflect the evidence to be adduced against WR Grace at trial.



Was the diagnosing doctor certified as a pulmonologist or internist by the American Board of Internal Medicine at the time of the diagnosis? ☐ Yes ☐ No See attached medical records and reports

Was the diagnosing doctor certified as a pathologist by the American Board of Pathology at the time of the diagnosis? ☐ Yes ☐ No See attached medical records and reports.

Was the diagnosing doctor provided with your complete occupational, medical and smoking history prior to diagnosis? ☐ Yes ☐ No See attached medical records and reports

Did the diagnosing doctor perform a physical examination? ☐ Yes ☐ No See attached medical records and reports.

Do you currently use tobacco products? ☐ Yes ☐ No

Have you ever used tobacco products? ☐ Yes ☐ No

If answer to either question is yes, please indicate whether you have regularly used any of the following tobacco products and the dates and frequency with which such products were used:

☐ Cigarettes Packs Per Day (half pack = .5) _____ Start Year _____ End Year _____

☐ Cigars Cigars Per Day _____ Start Year _____ End Year _____

☐ If Other Tobacco Products, please specify (e.g., chewing tobacco): _____

Amount Per Day _____ Start Year _____ End Year _____

Have you ever been diagnosed with chronic obstructive pulmonary disease ("COPD")? ☐ Yes ☐ No

If yes, please attach all documents regarding such diagnosis and explain the nature of the diagnosis:

Claimant objects to this request. The information requested is equally accessible to W.R. Grace from the attached answers to interrogatories and medical records.

3. Information Regarding Chest X-Ray

Claimant objects for the reason that claimant it is unclear what "your chest x-ray" refers to. In response to the question and without waiving the objection, claimant refers WR Grace to the attached medical records and reports.

Please check the box next to the applicable location where your chest x-ray was taken (check one):

☐ Mobile laboratory ☐ Job site ☐ Union Hall ☐ Doctor office ☐ Hospital ☐ Other: _____

Address where chest x-ray taken: _____

Address

City

State/Province

Zip/Postal Code

**PART II: ASBESTOS-RELATED CONDITION(S) (Continued)****2. Information Regarding Chest X-Ray Reading**

Claimant objects for the reason that the information requested below is equally accessible to WR Grace from the attached medical records and reports and claimant refers WR Grace to the attached medical records and reports. Additionally, it would be unduly burdensome to require that claimant's reproduce in summary form the evidence which is readily obtainable from the attached records. The information requested is contained to the extent available in the attached medical records and reports.

Date of Reading: ____ / ____ / ____

ILO score: _____

Name of Reader: _____

Reader's Daytime Telephone Number: _____ (____) _____

Reader's Mailing Address: _____
Address

City _____ State/Province _____ Zip/Postal Code _____

With respect to your relationship to the reader, check all applicable boxes:

Was the reader paid for the services that he/she performed ☒ Yes ☐ No

If yes, please indicate who paid for the services performed: _____

Claimant has responsibility for payment for all services. If medical consultation was provided in connection with claimant's legal claim, the costs of such services are normally advanced by claimant's law firm and deducted from any settlements received _____

Did you retain counsel in order to receive any of the services performed by the reader? ☐ Yes ☐ No

Claimant objects for the reason that information concerning the attorney-client relationship is privileged.

Was the reader referred to you by counsel? ☐ Yes ☐ No See the attached medical reports and records.Are you aware of any relationship between the reader and your legal counsel? ☐ Yes ☒ No

If yes, please explain: _____

Was the reader certified by the National Institute for Occupational Safety and Health at the time of the reading?

Claimant objects for the reason the information requested is equally accessible to WR Grace from the attached medical reports and the NIOSH list of certified B readers. Claimant is informed and believes that doctors consulted by counsel who complete ILO forms are generally NIOSH certified readers.

..... ☐ Yes ☐ No

If the reader is not a certified B-reader, please describe the reader's occupation, specialty, and the method through which the reading was made: _____

Claimant objects for the reasons stated in the previous question and claimant refers WR Grace to the attached medical records for the information requested.

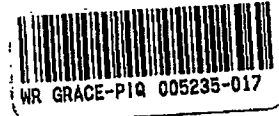
5. Information Regarding Pulmonary Function Test: Date of Test: ____ / ____ / ____

Claimant objects for the reason that the information requested below is equally accessible to WR Grace from the attached medical records and reports and claimant refers WR Grace to the attached medical records and reports. Additionally, it would be unduly burdensome to require that claimant's reproduce in summary form the evidence which is readily obtainable from the attached records. Claimant further objects because this case has not yet been set for trial as to WR Grace and full trial workup as to WR Grace may not yet have been completed. WR Grace's discovery request is therefore untimely under applicable state law and may not reflect the evidence to be adduced against WR Grace at trial.

See the attached medical records and reports for the information that is available.

List your height in feet and inches when test given: _____ ft _____ inches

List your weight in pounds when test given: _____ lbs



Total Lung Capacity (TLC): % of predicted

Forced Vital Capacity (FVC): % of predicted

FEV1/FVC Ratio: % of predicted

Name of Doctor Performing Test (if applicable):

Doctor's Specialty:

Name of Clinician Performing Test (if applicable):

Testing Doctor or Clinician's Mailing Address:
Address

City State/Province Zip/Postal Code

Testing Doctor or Clinician's Daytime Telephone Number: () -

Name of Doctor Interpreting Test:

Doctor's Specialty:

Interpreting Doctor's Mailing Address:
Address

City State/Province Zip/Postal Code

Interpreting Doctor's Daytime Telephone Number: () -


PART II: ASBESTOS-RELATED CONDITION(S) (Continued)

With respect to your relationship to the doctor or clinician who performed the pulmonary function test check all applicable boxes:

If the test was performed by a doctor, was the doctor your personal physician?..... ☐ Yes ☐ No

Claimant objects to the term "personal physician" for the reason that it is vague. Without waiving the objection, claimant interprets "personal" to mean a physician who reviewed information personal to claimant, and claimant asserts that the physicians who found asbestos-related disease in claimant reviewed personal information concerning claimant. Claimant has attached copies of medical reports and records, and claimant refers WR Grace to such records to determine the nature of the relationship.

Was the testing doctor and/or clinician paid for the services that he/she performed? ☒ Yes ☐ No

If yes, please indicate who paid for the services performed:.....

Claimant has responsibility for payment for all services. If medical consultation was provided in connection with claimant's legal claim, the costs of such services are normally advanced by claimant's law firm and deducted from any settlements received

Did you retain counsel in order to receive any of the services performed by the testing doctor or clinician? .. ☐ Yes ☐ No

Claimant objects for the reason that information concerning the attorney-client relationship is privileged.

Was the testing doctor or clinician referred to you by counsel? ☐ Yes ☐ No

See the attached medical reports and records.

Are you aware of any relationship between either the doctor or clinician and your legal counsel? ☐ Yes ☒ No

If yes, please explain:

Was the testing doctor certified as a pulmonologist or internist by the American Board of Internal Medicine at the time of the pulmonary function test? ☐ Yes ☐ No

Claimant objects for the reason that the identity of the medical doctors is disclosed in the attached medical reports or records and claimant refers WR Grace to such records. WR Grace has equal accessibility to the national registries which list board certifications for medical providers. Claimant is informed and believes that medical providers consulted by claimant's counsel are board certified in their appropriate fields. Claimant does not have personal knowledge concerning medical providers not consulted by counsel, but assumes this knowledge is accessible to WR Grace from the appropriate certification entities.

With respect to your relationship to the doctor interpreting the results of the pulmonary function test check all applicable boxes:

Was the doctor your personal physician?..... ☒ Yes ☐ No

Claimant objects to the term "personal physician" for the reason that it is vague. Without waiving the objection, claimant interprets "personal" to mean a physician who reviewed information personal to claimant, and claimant asserts that the physicians who found asbestos-related disease in claimant reviewed personal information concerning claimant. Claimant has attached copies of medical reports and records, and claimant refers WR Grace to such records to determine the nature of the relationship.

Was the doctor paid for the services that he/she performed?..... ☒ Yes ☐ No

If yes, please indicate who paid for the services performed:.....

Claimant has responsibility for payment for all services. If medical consultation was provided in connection with claimant's legal claim, the costs of such services are normally advanced by claimant's law firm and deducted from any settlements received

Did you retain counsel in order to receive any of the services performed by the doctor? ☐ Yes ☐ No

Claimant objects for the reason that information concerning the attorney-client relationship is privileged..

Was the doctor referred to you by counsel?..... ☐ Yes ☐ No See the attached medical reports and records.

Are you aware of any relationship between the doctor and your legal counsel? ☐ Yes ☒ No

If yes, please explain



Was the doctor interpreting the pulmonary function test results certified as a pulmonologist or internist by the American Board of Internal Medicine at the time the test results were reviewed? ☐ Yes ☐ No

Claimant objects for the reason that the identity of the medical doctors is disclosed in the attached medical reports or records and claimant refers WR Grace to such records. WR Grace has equal accessibility to the national registries which list board certifications for medical providers. Claimant is informed and believes that medical providers consulted by claimant's counsel are board certified in their appropriate fields. Claimant does not have personal knowledge concerning medical providers not consulted by counsel, but assumes this knowledge is accessible to WR Grace from the appropriate certification entities.

2. Information Regarding Pathology Reports:

Claimant objects for the reason that the information requested below is equally accessible to WR Grace from the attached medical records and reports and claimant refers WR Grace to the attached medical records and reports. Additionally, it would be unduly burdensome to require that claimant's reproduce in summary form the evidence which is readily obtainable from the attached records. Claimant further objects because this case has not yet been set for trial as to WR Grace and full trial workup as to WR Grace may not yet have been completed. WR Grace's discovery request is therefore untimely under applicable state law and may not reflect the evidence to be adduced against WR Grace at trial.

See the attached medical records and reports for information that is available.

Date of Pathology Report: _____ / _____ / _____

Findings: _____

Name of Doctor Issuing Report: _____

Doctor's Specialty: _____

Doctor's Mailing Address: _____
Address

City _____ State/Province _____ Zip/Postal Code _____

Doctor's Daytime Telephone Number: _____ (_____) _____ - _____

With respect to your relationship to the doctor issuing the pathology report, check all applicable boxes:

Was the doctor your personal physician? ☒ Yes ☐ No

Claimant objects to the term "personal physician" for the reason that it is vague. Without waiving the objection, claimant interprets "personal" to mean a physician who reviewed information personal to claimant, and claimant asserts that the physicians who found asbestos-related disease in claimant reviewed personal information concerning claimant. Claimant has attached copies of medical reports and records, and claimant refers WR Grace to such records to determine the nature of the relationship.

Was the doctor paid for the services that he/she performed? ☒ Yes ☐ No

If yes, please indicate who paid for the services performed: _____

Claimant has responsibility for payment for all services. If medical consultation was provided in connection with claimant's legal claim, the costs of such services are normally advanced by claimant's law firm and deducted from any settlements received

Did you retain counsel in order to receive any of the services performed by the doctor? ☐ Yes ☒ No

Claimant objects for the reason that information concerning the attorney-client relationship is privileged.

Was the doctor referred to you by counsel? ☐ Yes ☐ No See the attached medical reports and records.

Are you aware of any relationship between the doctor and your legal counsel? ☐ Yes ☒ No

If yes, please explain: _____

Was the doctor certified as a pathologist by the American Board of Pathology at the time of the diagnosis? ☐ Yes ☐ No

Claimant objects for the reason that the identity of the medical doctors is disclosed in the attached medical reports or records and claimant refers WR Grace to such records. WR Grace has equal accessibility to the national registries which list board certifications for medical providers. Claimant is informed and believes that medical providers consulted by claimant's counsel are board certified in their appropriate fields. Claimant does not have personal knowledge concerning medical providers not consulted by counsel, but assumes this knowledge is accessible to WR Grace from the appropriate certification entities.



WR GRACE-PIQ 005235-020

PART II: ASBESTOS-RELATED CONDITION(S) (Continued)

7. With respect to the condition alleged, have you received medical treatment from a doctor for the condition?

..... ☐ Yes ☐ No

Objection for the reason that it is unclear what is meant by the term "medical treatment". Claimant believes that all work reflected in the attached medical records and reports involves medical treatments. Without waiving the objection, Claimant refers WR Grace to the attached medical reports and records for work performed by the medical doctor.

If yes, please complete the following:

Name of Treating Doctor: _____

Treating Doctor's Specialty: _____

Treating Doctor's Mailing Address: _____
Address

City State/Province Zip/Postal Code

Treating Doctor's Daytime Telephone number: (____) ____ - ____

Was the doctor paid for the services that he/she performed? ☒ Yes ☐ No

Claimant has responsibility for payment for all services. If medical condition was provided in connection with claimant's legal claim, the costs of such services are normally advanced by claimant's law firm and deducted from any settlements received.

If yes, please indicate who paid for the services performed: _____

Did you retain counsel in order to receive any of the services performed by the doctor? ☐ Yes ☐ No

Claimant objects for the reason that information concerning the attorney-client relationship is privileged.

[REMAINDER OF PAGE INTENTIONALLY BLANK]

PART III: DIRECT EXPOSURE TO GRACE ASBESTOS-CONTAINING PRODUCTS

Claimant objects for the reason that the request is unduly burdensome give the time constraints claimant has to provide the information. For many years prior to WR Grace's bankruptcy, claimant through claimant's counsel had a tolling agreement with WR Grace which prevented litigation and discovery against WR Grace. Claimant is now being requested to produce trial ready evidence without the ability to individually discover evidence against WR Grace concerning specific job sites worked at by claimant and in a time frame that is unrealistically short. In addition, WR Grace historically has resolved claims for exposure at the job sites at issue, and WR Grace has access to the information concerning exposure which has been provided to WR Grace as part of prior administrative settlements. This request is therefore redundant and the information is as readily available to WR Grace as to claimant. Without waiving these objections, see attached for the exposure information currently available to claimant.

Please complete the chart below for each site at which you allege exposure to Grace asbestos-containing products. If you allege exposure at multiple sites, the Court has ordered that you must complete a separate chart for each site. For your convenience, additional copies of Part III are attached as Appendix D to this Questionnaire.

If exposure was in connection with your employment, use the list of occupation and industry codes in the Instructions to Part III to indicate your occupation and the industry in which you worked.

In the "Nature of Exposure" column, for each job listed, please indicate the letter(s) corresponding to whether you were any of the following during your exposure:

- (a) A worker who personally mixed Grace asbestos-containing products
- (b) A worker who personally removed or cut Grace asbestos-containing products
- (c) A worker who personally installed Grace asbestos-containing products
- (d) A worker at a site where Grace asbestos-containing products were being installed, mixed, removed or cut by others
- (e) A worker in a space where Grace asbestos-containing products were being installed, mixed, removed or cut by others
- (f) If other, please specify.

Site of Exposure:

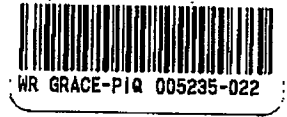
Site Name: _____ Location: _____

Site Type: ☐ Residence ☐ Business Site Owner: _____

Employer During Exposure: _____ Unions of which you were a member during your employment: _____

	Product(s)	Basis for Identification of Each Grace Product	Dates and Frequency of Exposure (hours/day, days/year)	Occupation Code <i>If Code 59, specify.</i>	Industry Code <i>If Code 118, specify.</i>	Was exposure due to working in or around areas where product was being installed, mixed, removed, or cut? <i>If Yes, please indicate your regular proximity to such areas</i>	Nature of Exposure
Job 1 Description							
Job 2 Description							
Job 3 Description							





Job 4 Description								
Job 5 Description								
Job 6 Description								



PART IV: INDIRECT EXPOSURE TO GRACE ASBESTOS-CONTAINING PRODUCTS

Claimant objects for the reasons set forth in all previous objections set forth above. Information regarding exposures from co-workers using W.R. Grace products or others is contained in the attached documents.

1. Are you asserting an injury caused by exposure to Grace asbestos-containing products through contact/proximity with another injured person? ☐ Yes ☐ No

If yes, complete questions 2 through 10 of this section for each injured person through which you allege exposure to Grace asbestos-containing products. For your convenience, additional copies of Part IV are attached as Appendix E to this Questionnaire.

2. Please indicate the following information regarding the other injured person:

Name of Other Injured Person: _____ Gender: ☐ Male ☐ Female

Last Four Digits of Social Security Number: _____ Birth Date: ____/____/____

3. What is your Relationship to Other Injured Person: ☐ Spouse ☐ Child ☐ Other

4. Nature of Other Injured Person's Exposure to Grace Asbestos-Containing Products:

5. Dates Other Injured Person was Exposed to Grace Asbestos-Containing Products:

From: ____/____/____ To: ____/____/____

6. Other Injured Person's Basis for Identification of Asbestos-Containing Product as Grace Product:

7. Has the Other Injured Person filed a lawsuit related to his/her exposure? ☐ Yes ☐ No

If yes, please provide caption, case number, file date, and court name for the lawsuit:

Caption: _____

Case Number: _____ File Date: ____/____/____

Court Name: _____

8. Nature of Your Own Exposure to Grace Asbestos-Containing Product:

9. Dates of Your Own Exposure to Grace Asbestos-Containing Product:

From: ____/____/____ To: ____/____/____

10. Your Basis for Identification of Asbestos-Containing Product as Grace Product:

[REMAINDER OF PAGE INTENTIONALLY BLANK]

PART V: EXPOSURE TO NON-GRACE ASBESTOS-CONTAINING PRODUCTS

Claimant objects for the reason that the request is unduly burdensome and equally accessible to WR Grace as claimant. Claimant is being requested to produce trial ready evidence in an unrealistically short time frame and in a time frame that does not necessarily track the discovery schedules of the underlying tort case. Further, this information is not necessary to determine exposure to a WR Grace product and would be irrelevant in determining whether a prima facie case exists against WR Grace. Additionally, WR Grace has equal access to this information. Without waiving these objections, claimant refers WR Grace to claimant's complaint in the underlying tort case which contains claimant's allegations of exposure and defendants' responses and motions concerning complaint's allegations.

Please complete the chart below for each party against which you have filed a lawsuit and/or claim alleging exposure to asbestos-containing products other than Grace products. If you filed such lawsuits and/or claims against multiple parties, the Court has ordered that you must complete a separate chart for each party. For your convenience, additional copies of Part V are attached as Appendix F to this Questionnaire.

If exposure was in connection with your employment, use the list of occupation and industry codes in the Instructions to Part III to indicate your occupation and the industry in which you worked. In the "Nature of Exposure" column, for each product listed, please indicate the letter(s) corresponding to whether you were any of the following during your exposure:

- (a) A worker who personally mixed Non-Grace asbestos-containing products
- (b) A worker who personally removed or cut Non-Grace asbestos-containing products
- (c) A worker who personally installed Non-Grace asbestos-containing products
- (d) A worker at a site where Non-Grace asbestos-containing products were being installed, mixed, removed or cut by others
- (e) A worker in a space where Non-Grace asbestos-containing products were being installed, mixed, removed or cut by others
- (f) If other, please specify.

Party Against which Lawsuit or Claim was Filed:		Product(s)	Dates and Frequency of Exposure (hours/day, days/year)	Occupation Code <i>If Code 59, specify.</i>	Industry Code <i>If Code 118, specify.</i>	Was exposure due to working in or around areas where product was being installed, mixed, removed, or cut? <i>If Yes, please indicate your regular proximity to such areas</i>	Nature of Exposure
Site of Exposure 1		Job 1 Description:					
Site Name: _____		Job 2 Description:					
Address: _____		Job 3 Description:					
City and State: _____							
Site Owner: _____							
Site of Exposure 2		Job 1 Description:					
Site Name: _____		Job 2 Description:					
Address: _____		Job 3 Description:					
City and State: _____							
Site Owner: _____							
Site of Exposure 3		Job 1 Description:					
Site Name: _____		Job 2 Description:					
Address: _____		Job 3 Description:					
City and State: _____							
Site Owner: _____							



**PART VI: EMPLOYMENT HISTORY**

See attached work history.

Other than jobs listed in Part III or V, please complete this Part VI for all of your prior industrial work experience up to and including your current employment. For each job, include your employer, location of employment, and dates of employment. Only include jobs at which you worked for at least one month. Please use the copy of Part VI attached as Appendix G to this Questionnaire if additional space is needed.

Occupation Code: _____ If Code 59, specify: _____

Industry Code: _____ If Code 118, specify: _____

Employer: _____

Beginning of Employment: ____ / ____ / ____ End of Employment: ____ / ____ / ____

Location: _____

Address

City _____ State/Province _____ Zip/Postal Code _____

Occupation Code: _____ If Code 59, specify: _____

Industry Code: _____ If Code 118, specify: _____

Employer: _____

Beginning of Employment: ____ / ____ / ____ End of Employment: ____ / ____ / ____

Location: _____

Address

City _____ State/Province _____ Zip/Postal Code _____

Occupation Code: _____ If Code 59, specify: _____

Industry Code: _____ If Code 118, specify: _____

Employer: _____

Beginning of Employment: ____ / ____ / ____ End of Employment: ____ / ____ / ____

Location: _____

Address

City _____ State/Province _____ Zip/Postal Code _____

Occupation Code: _____ If Code 59, specify: _____

Industry Code: _____ If Code 118, specify: _____

Employer: _____

Beginning of Employment: ____ / ____ / ____ End of Employment: ____ / ____ / ____

Location: _____

Address

City _____ State/Province _____ Zip/Postal Code _____


PART VII: LITIGATION AND CLAIMS REGARDING ASBESTOS AND/OR SILICA
a. LITIGATION

1. Have you ever been a plaintiff in a lawsuit regarding asbestos or silica? ☒ Yes ☐ No

If yes, please complete the rest of this Part VII(a) for each lawsuit. For your convenience, additional copies of Part VII are attached as Appendix G to this Questionnaire

2. Please provide the caption, case number, file date, and court name for the lawsuit you filed:

Caption: _____

Case Number: **REDACTED** File Date: _____

Court Name: _____

3. Was Grace a defendant in the lawsuit? ☐ Yes ☐ No

(If no) Claimant's counsel had an administrative settlement agreement with WR Grace. As part of this agreement, claimant agreed to refrain from suing WR Grace in exchange for resolving claims after evaluation of medical information and exposure. The tolling agreement was in effect at the time that WR Grace filed for Chapter 11 reorganization.

4. Was the lawsuit dismissed against any defendant? ☐ Yes ☐ No

Claimant objects because this request is unduly burdensome. As WR Grace well-knows, during the course of a lawsuit defendants are dismissed or added as evidence develops. In order to accurately answer this question, claimant would have to review the docket of the entire case which WR Grace can do as readily as claimant.

If yes, please provide the basis for dismissal of the lawsuit against each defendant:

Claimant objects for the reasons stated above.

5. Has a judgment or verdict been entered? ☐ Yes ☐ No

If yes, please indicate verdict amount for each defendant(s): _____

6. Was a settlement agreement reached in this lawsuit? ☐ Yes ☐ No

Claimant objects for the reason that such information is confidential and is not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the disclosure of such settlement information would chill settlement discussions with any remaining defendants. Claimant also objects because such information is not discoverable under controlling state law at this stage of litigation.

If yes and the settlement was reached on or after April 2, 2001, please indicate the following:

a. Settlement amount for each defendant: _____

b. Applicable defendants: _____

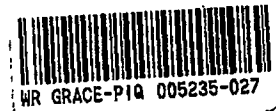
c. Disease or condition alleged: _____

d. Disease or condition settled (if different than disease or condition alleged): _____

7. Were you deposed in this lawsuit? ☐ Yes ☐ No

If yes and Grace was not a party in the lawsuit, please attach a copy of your deposition to this Questionnaire.

Claimant objects for the reason that request is unduly burdensome and WR Grace has an equal ability to obtain a copy of a deposition from the court reporting service which took the deposition. Claimant was required to pay the court reporting service for a copy of the deposition and each defendant in a case is also required to pay for its copy of a deposition.

**b. CLAIMS**

1. Have you ever asserted a claim regarding asbestos and/or silica, including but not limited to a claim against an asbestos trust (other than a formal lawsuit in court)?..... ☒ Yes ☐ No

If yes, please complete the rest of this Part VII(b). If no, please skip to Part VIII.

Claimant objects on the basis that the information requested is confidential and is not reasonably calculated to lead to the discovery of any admissible evidence. In addition, by violating the confidentiality of settlements, disclosure of such information would chill settlement discussions with other defendants. The request is also unduly burdensome. Claimant further objects because the information, if not confidential, would be equally accessible to WR Grace by subpoena. It would be as burdensome for claimant to assemble the information as for WR Grace to do it.

2. Date the claim was submitted: / /
3. Person or entity against whom the claim was submitted:
4. Description of claim:
5. Was claim settled?..... ☐ Yes ☐ No
6. Please indicate settlement amount:.....\$
7. Was the claim dismissed or otherwise disallowed or not honored?..... ☐ Yes ☐ No
- If yes, provide the basis for dismissal of the claim:*

**PART VIII: CLAIMS BY DEPENDENTS OR RELATED PERSONS**

Objection for the reason that the requested information is vague. Claimant is unclear about what is meant by the term "dependents or related persons". Because of this lack of clarity, claimant will answer only with respect to individuals claimed as dependents on IRS income tax returns currently if the asbestos victim is alive or prior to the time of death if the asbestos victim is deceased.

Name of Dependent or Related Person: Gender: ☐ Male ☒ Female

Last Four Digits of Social Security Number: Birth Date:

Financially Dependent: ☒ Yes ☐ No

Relationship to Injured Party: ☒ Spouse ☐ Child ☐ Other If other, please specify

Mailing Address:
Address

REDACTED

City State/Province Zip/Postal Code

Daytime Telephone number:

PART IX: SUPPORTING DOCUMENTATION

Please use the checklists below to indicate which documents you are submitting with this form.

Claimant objects because the request is unduly burdensome and that the attached documentation is sufficiently identified

Copies:

- | | |
|---|--|
| <input type="checkbox"/> Medical records and/or report containing a diagnosis | <input type="checkbox"/> X-rays |
| <input type="checkbox"/> Lung function test results | <input type="checkbox"/> X-ray reports/interpretations |
| <input type="checkbox"/> Lung function test interpretations | <input type="checkbox"/> CT scans |
| <input type="checkbox"/> Pathology reports | <input type="checkbox"/> CT scan reports/interpretations |
| <input type="checkbox"/> Supporting documentation of exposure to Grace asbestos-containing products | <input type="checkbox"/> Depositions from lawsuits indicated in Part VII of this Questionnaire |
| <input type="checkbox"/> Supporting documentation of other asbestos exposure | <input type="checkbox"/> Death Certification |

Originals:

- | | |
|---|--|
| <input type="checkbox"/> Medical records and/or report containing a diagnosis | <input type="checkbox"/> Supporting documentation of other asbestos exposure |
| <input type="checkbox"/> Lung function test results | <input type="checkbox"/> X-rays |
| <input type="checkbox"/> Lung function test interpretations | <input type="checkbox"/> X-ray reports/interpretations |
| <input type="checkbox"/> Pathology reports | <input type="checkbox"/> CT scans |
| <input type="checkbox"/> Supporting documentation of exposure to Grace asbestos-containing products | <input type="checkbox"/> CT scan reports/interpretations |
| | <input type="checkbox"/> Death Certification |

Grace will reimburse your reasonable expenses incurred in providing (a) copies of depositions you have given in lawsuits in which Grace was not a party and/or (b) any documents you have previously provided to Grace in prior litigation. Please indicate the documents for which you are seeking reimbursement and attach a receipt for such costs:

PART X: ATTESTATION THAT INFORMATION IS TRUE AND ACCURATE

The information provided in this Questionnaire must be accurate and truthful. This Questionnaire is an official court document that may be used as evidence in any legal proceeding regarding your Claim. The penalty for presenting a fraudulent Questionnaire is a fine of up to \$500,000 or imprisonment for up to five years, or both. 18 U.S.C. §§ 152 & 3571.
TO BE COMPLETED BY THE INJURED PERSON.

I swear, under penalty of perjury, that, to the best of my knowledge, all of the foregoing information contained in this Questionnaire is true, accurate and complete.

Signature:

Date: 12 / 02 / 05

Please Print Name:

REDACTED**TO BE COMPLETED BY THE LEGAL REPRESENTATIVE OF THE INJURED PERSON.**

I swear that, to the best of my knowledge, all of the information contained in this Questionnaire is true, accurate and complete.

Signature: 

Date: **January 9, 2006**

Please Print Name: **Michael B. Serling**

MICHAEL B. SERLING, P.C.

Attorneys and Counselors at Law

280 NORTH OLD WOODWARD AVENUE

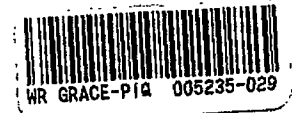
SUITE 406

BIRMINGHAM, MICHIGAN 48009

(248) 647-6966

FAX (248) 647-9630

MICHAEL B. SERLING
RUSSELL R. BEAUDOEN
THOMAS A. SMITH
ERIC B. ABRAMSON



OF COUNSEL
GOLDBERG, PERSKY,
JENNINGS & WHITE, P.C.
PITTSBURGH SAGINAW

OF COUNSEL
PHILIP J. GOODMAN, P.C.

March 14, 2001

Clerk of the Court
Wayne County Circuit Court
201 Coleman A. Young Municipal Center
Detroit, Michigan 48226

FILE COPY

RE:

REDACTED

Dear Clerk:

Enclosed for filing please find the following documents regarding the above entitled cause of action:

1. Plaintiff('s') Discovery Brochure; and
2. Proof of Service (with Attorney of Record list attached).

Sincerely,

Russell R. Beaudoen

Russell R. Beaudoen

RRB:ldk

Enc.

cc All Counsel of Record

ldkc:\codes\disbro.ltr



STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

REDACTED

00-009221 NF 3/22/00
JDS: ROBERT J. COLOMBO JJ

Plaintiff(s),

VS

-v-

A P GREEN REFRACTORIES CO

REDACTED

Defendants.

RUSSELL R. BEAUDOEN (P41185)
Attorney for Plaintiff(s)

PLAINTIFF('S') DISCOVERY BROCHURE

Attached hereto, is the product identification table, which sets forth exposure to asbestos-containing products of the various defendants and details relative to said exposures.

This Discovery Brochure also includes the names of co-workers and employment witnesses and their addresses, where known, which information constitutes a part of the Witness List.

Russell R. Beaudoin
RUSSELL R. BEAUDOEN (P41185)
Attorney for Plaintiff(s)
280 N. Old Woodward, Ste. 406
Birmingham, Michigan 48009
(248) 647-6966

DATED: March 6, 2001

LAW OFFICES
MICHAEL B. SERLING, P.C.
10 NORTH OLD WOODWARD AVE
SUITE 406
BIRMINGHAM, MICH 48009
(248) 647-6966



PLAINTIFF'S DISCOVERY BROCHURE

PLAINTIFF:

REDACTED

OCCUPATION: Laborer

EMPLOYERS: Kelsey-Hayes (1965-1995)

WORK PLACE: Kelsey-Hayes Plant, Detroit, MI (1965-1995)

JOB CONDITIONS: Open and enclosed; inside areas

PERIOD WORKED: 1965-1995

NATURE OF EXPOSURE TO ASBESTOS: Continuous involvement in Production and Maintenance activities at Kelsey-Hayes; resulting exposure to airborne asbestos fiber occurred from (1) the utilization of asbestos containing insulation, refractory and building materials consisting of pipecovering, block, cements, firebrick, castables, millboard, asbestos cloth, asbestos paper installed on cupolas, ovens, steamlines, piping, duct work, heat exchangers, furnaces, kilns and other equipment; (2) working in cooperation with and in close proximity to co-workers, plant personnel and tradesmen such as Asbestos Workers, Bricklayers, Laborers, Boilermakers and Pipefitters involved in the handling, mixing, fabrication and application of asbestos containing insulation, refractories and building materials; (3) disturbance, deterioration, friability and removal of asbestos laden products previously installed; (4) clean-up of asbestos scrap and dusts with a broom and/or air hose; (5) shipping, handling and storage of asbestos

LAW OFFICES
MICHAEL B. SERLING, P.C.
30 NORTH OLD WOODWARD AVE
SUITE 406
BIRMINGHAM, MICH 38209
(248) 647-6966



products; and from (7) contamination of asbestos dust in the work place resulting from plant operations and the above existing conditions.

THE FOLLOWING PRODUCT IDENTIFICATION CONSTITUTES A PARTIAL LIST AND REPRESENTATION OF ASBESTOS EXPOSURES.

JOB NO.: 1

PERIOD WORKED: 1965-1995, 30 Years

JOB SITE AND LOCATION: Kelsey-Hayes Plant, Detroit, MI

EMPLOYER(S): Kelsey-Hayes Co.

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS, PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR FURNACES: Arthur J. Peacock; Bigelow-Liptak; F.B. Wright; Schad Boiler; Coon DeVisser; Brown Insulation; Owens Corning Fiberglas Corporation

PRODUCTS

Unibestos P/C
Kaylo P/C and Block
85% Mag. P/C and Block

85% Mag. P/C Block & Cement

Asb. Millboard

7M-90 Cement

85% Mag. P/C, Block & Cement
85% Mag. P/C, Block & Cement
Asb. Cement
Calsilite P/C and Block
7M Cement
Asb. Millboard
Asb. Paper
K-FAC Asb. Block Insulation
Asb. Cement
Insulating Cement
Sk-7 & KS4 Gunning Refractory
Asb. Lined Firebrick
Asb. Rollboard
Lightweight Insulating
Castable
Stic-tite Cement
Zerobestos Cement

Insulating Cement

MANUFACTURERS

PITTSBURGH CORNING
OWENS CORNING FIBERGLAS
ARMSTRONG CORK CO.
(Armstrong World Industries)
KEASBEY & MATTISON/T & N/
FEDERAL-MOGUL
PHILIP CAREY CO. (Celotex/
Rapid American)
PHILIP CAREY CO. (Celotex/
Rapid American)
JOHNS-MANVILLE
MUNDET CORK (Crown Cork & Seal)
PABCO (Fibreboard)
RUBEROID CO. (Gaf)
RUBEROID CO. (Gaf)
RUBEROID CO. (Gaf)
RUBEROID CO. (Gaf)
UNITED STATES GYPSUM
GOLDBOND (National Gypsum)
A.P. GREEN REFRACTORIES
A.P. GREEN REFRACTORIES
HARBISON WALKER
HARBISON WALKER

HARBISON WALKER
COMBUSTION ENGINEERING
STANDARD FUEL ENGINEERING
(Asbestos Fiber supplied by
REX/ROTO CORPORATION)
GREFCO (General Refractories)

PRODUCTS CONTINUED

Lite Cast Insulating Castable
 Insulating Cement
 Narcolite Insulating Castable
 Asb. Block Insulation
 Asb. Insulating and
 Finishing Cements
 Lite Kastite
 Runner Patch and
 Expansion Joint Sealer
 Brikset
 Insulag
 Asb. Furnace Cement
 Asb. Mastics
 Asb. Mastics
 Monokote Sprayed Fireproofing
 Zonolite Insulation
 Asb. Gaskets
 Asb. Gaskets
 Asb. Gaskets and Packing
 Asb. Gaskets and Packing
 Asb. Gaskets and Packing
 Asb. Insulated Pumps
 Asb. Lined Heat
 Treat Furnaces

Asb. Wrapped/Lined
 Turbines and Generators
 Asb. Wrapped/Lined Boilers

MANUFACTURERS CONTINUED

GREFCO (General Refractories)
 NARCO (North American Ref.)
 NARCO (North American Ref.)
 PLIBRICO
 PLIBRICO
 CHICAGO FIRE BRICK
 CHICAGO FIRE BRICK
 CHICAGO FIRE BRICK
 QUIGLEY CO., INC.
 SURE SEAL PRODUCTS CO.
 AMCHEM PRODUCTS CO.
 FLINTKOTE
 W.R. GRACE
 W.R. GRACE
 FLEXITALLIC
 GARLOCK, INC.
 ANCHOR PACKING COMPANY
 PALMETTO (Greene, Tweed)
 ARGO PACKING
 INGERSOLL-RAND
 SURFACE COMBUSTION
 (Midland Ross)

CO-WORKER WITNESSES: The following individuals have been contacted and it is anticipated that they will be able to identify the use of some, several or all of the above identified asbestos product exposures:

REDACTED

*

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: F.B. Wright

PRODUCTS

Kaylo Block
 Asb. Millboard
 Insulating Cement
 Narcolite Insulating Castable
 Brikset
 Asb. Furnace Cement
 Monokote Sprayed Fireproofing
 Zonolite Insulation
 Asb. Gaskets
 Asb. Insulated Pumps

MANUFACTURERS

OWENS CORNING FIBERGLAS
 RUBEROID CO. (Gaf)
 A.P. GREEN REFRACTORIES
 NARCO (North American Ref.)
 CHICAGO FIRE BRICK
 SURE SEAL PRODUCTS CO.
 W.R. GRACE
 W.R. GRACE
 GARLOCK, INC.
 INGERSOLL-RAND



*James Johnson: 16216 Princeton, Detroit, MI 48221

PRODUCTS

Kaylo P/C and Block
Insulating Cement
Lightweight Insulating
Castable
Insulating Cement
Insulag
Monokote Sprayed Fireproofing
Asb. Gaskets

MANUFACTURERS

OWENS CORNING FIBERGLAS
A.P. GREEN REFRACTORIES
HARBISON WALKER
GREFCO (General Refractories)
QUIGLEY CO., INC.
W.R. GRACE
GARLOCK, INC.

*Frederick Wiley: 17865 Stasburg, Detroit, MI 48205

PRODUCTS

Insulating Cement
Zonolite Insulation

MANUFACTURERS

A.P. GREEN REFRACTORIES
W.R. GRACE

*George Miller: 18919 Glenhurst, Detroit, MI 48219

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
FURNACES: F.B. Wright; Schad Boiler

PRODUCTS

Kaylo P/C and Block
85% Mag. P/C, Block & Cement
85% Mag. P/C, Block & Cement
Asb. Cement
Asb. Millboard
Asb. Paper
Asb. Cement
Insulating Cement
Lightweight Insulating
Castable
Narcolite Insulating Castable
Lite Kastite
Brikset
Asb. Furnace Cement
Zonolite Insulation
Asb. Gaskets

MANUFACTURERS

OWENS CORNING FIBERGLAS
JOHNS-MANVILLE
MUNDET CORK (Crown Cork & Seal)
PABCO (Fibreboard)
RUBEROID CO. (Gaf)
RUBEROID CO. (Gaf)
GOLDBOND (National Gypsum)
A.P. GREEN REFRACTORIES
HARBISON WALKER
NARCO (North American Ref.)
CHICAGO FIRE BRICK
CHICAGO FIRE BRICK
SURE SEAL PRODUCTS CO.
W.R. GRACE
GARLOCK, INC.

LAW OFFICES

ICHAEL B. SERLING, P.C.

30 NORTH OLD WOODWARD AVE

SUITE 406

BIRMINGHAM, MICH 48009

(248) 647-6965



*Ivene Sanders: 17821 Ego, Eastpointe, MI 48021
 CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Schad Boiler

PRODUCTS

Kaylo P/C and Block
 85% Mag. P/C, Block & Cement
 Insulating Cement
 Asb. Furnace Cement
 Asb. Insulating and
 Finishing Cements

MANUFACTURERS

OWENS CORNING FIBERGLAS
 MUNDET CORK (Crown Cork & Seal)
 A.P. GREEN REFRACTORIES
 SURE SEAL PRODUCTS CO.

PLIBRICO

*Ollie Green: 656 Alger, Detroit, MI 48202

PRODUCTS

Kaylo P/C and Block
 85% Mag. P/C, Block & Cement
 Insulating Cement
 Zerobestos Cement

MANUFACTURERS

OWENS CORNING FIBERGLAS
 MUNDET CORK (Crown Cork & Seal)
 A.P. GREEN REFRACTORIES
 STANDARD FUEL ENGINEERING
 (Asbestos Fiber supplied by
 REX/ROTO CORPORATION)
 GREFCO (General Refractories)

Insulating Cement
 Asb. Insulating and
 Finishing Cements
 Insulag
 Monokote Sprayed Fireproofing
 Zonolite Insulation

PLIBRICO
 QUIGLEY CO., INC.
 W.R. GRACE
 W.R. GRACE

*Edward Williams: 17301 Melrose, Southfield, MI

PRODUCTS

Kaylo P/C and Block
 Insulating Cement
 Insulating Cement

MANUFACTURERS

OWENS CORNING FIBERGLAS
 A.P. GREEN REFRACTORIES
 GREFCO (General Refractories)

*Eddie Ingram: 14676 Greenlawn, Detroit, MI 48238

PRODUCTS

Kaylo P/C and Block
 Insulating Cement
 Lite Kastite

MANUFACTURERS

OWENS CORNING FIBERGLAS
 GREFCO (General Refractories)
 CHICAGO FIRE BRICK

LAW OFFICES

MICHAEL B. SERLING, P.C.

80 NORTH OLD WOODWARD AVE

SUITE 406

BIRMINGHAM, MICH 48009

(248) 647-6966



*Thomas Hicks, Jr.: 9967 Ashton, Detroit, MI 48228

PRODUCTS

Kaylo P/C and Block
Insulating Cement
Insulating Cement
Asb. Insulating and
Finishing Cements
Asb. Wrapped/Lined
Turbines and Generators

MANUFACTURERS

OWENS CORNING FIBERGLAS
A.P. GREEN REFRACTORIES
GREFCO (General Refractories)

PLIBRICO

GENERAL ELECTRIC

*Lee Brown: 17215 Santa Barbara, Detroit, MI 48821

PRODUCTS

Kaylo P/C and Block
Asb. Millboard

Asb. Cement
Insulating Cement
Lightweight Insulating
Castable
Stic-tite Cement
Insulating Cement
Lite Cast Insulating Castable
Insulating Cement
Narcolite Insulating Castable
Lite Kastite
Insulag
Asb. Furnace Cement
Zonolite Insulation
Asb. Gaskets

MANUFACTURERS

OWENS CORNING FIBERGLAS
PHILIP CAREY CO. (Celotex/
Rapid American)
GOLDBOND (National Gypsum)
A.P. GREEN REFRACTORIES

HARBISON WALKER
COMBUSTION ENGINEERING
GREFCO (General Refractories)
GREFCO (General Refractories)
NARCO (North American Ref.)
NARCO (North American Ref.)
CHICAGO FIRE BRICK
QUIGLEY CO., INC.
SURE SEAL PRODUCTS CO.
W.R. GRACE
GARLOCK, INC.

LAW OFFICES

MICHAEL B. SERLING, P.C.

200 NORTH OLD WOODWARD AVE.

SUITE 400

BIRMINGHAM, MICH 48009

(248) 647-6966



*Charles Berry, Jr.: 22400 Chippewa, Detroit, MI 48219
CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
FURNACES: Schad Boiler

PRODUCTS

Kaylo P/C and Block
85% Mag. P/C and Block

7M-90 Cement

85% Mag. P/C, Block & Cement
Insulating Cement
Asb. Rollboard
Stic-tite Cement
Insulating Cement
Insulating Cement
Asb. Block Insulation
Asb. Insulating and
Finishing Cements
Lite Kastite
Brikset
Asb. Furnace Cement
Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
ARMSTRONG CORK CO.
(Armstrong World Industries)
PHILIP CAREY CO. (Celotex/
Rapid American)
JOHNS-MANVILLE
A.P. GREEN REFRACTORIES
HARBISON WALKER
COMBUSTION ENGINEERING
GREFCO (General Refractories)
NARCO (North American Ref.)
PLIBRICO

PLIBRICO
CHICAGO FIRE BRICK
CHICAGO FIRE BRICK
SURE SEAL PRODUCTS CO.
W.R. GRACE

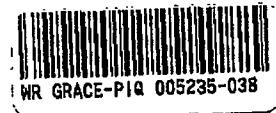
*Jessie Fagin: 8221 Kentucky, Detroit, MI

PRODUCTS

Kaylo P/C and Block
Insulating Cement
Insulating Cement
Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
A.P. GREEN REFRACTORIES
GREFCO (General Refractories)
W.R. GRACE



*Dale Percy: 12008 Duchess, Detroit, MI

PRODUCTS

Unibestos P/C
Kaylo P/C and Block
85% Mag. P/C and Block

85% Mag. P/C, Block & Cement
Asb. Millboard
Asb. Cement
Insulating Cement
Asb. Rollboard
Stic-tite Cement
Insulating Cement
Lite Cast Insulating Castable
Insulating Cement
Narcolite Insulating Castable
Asb. Insulating and
Finishing Cements
Lite Kastite
Insulag
Asb. Furnace Cement
Zonolite Insulation
Asb. Gaskets

MANUFACTURERS

PITTSBURGH CORNING
OWENS CORNING FIBERGLAS
ARMSTRONG CORK CO.
(Armstrong World Industries)
JOHNS-MANVILLE
RUBEROID CO. (Gaf)
GOLDBOND (National Gypsum)
A.P. GREEN REFRACTORIES
HARBISON WALKER
COMBUSTION ENGINEERING
GREFCO (General Refractories)
GREFCO (General Refractories)
NARCO (North American Ref.)
NARCO (North American Ref.)

PLIBRICO
CHICAGO FIRE BRICK
QUIGLEY CO., INC.
SURE SEAL PRODUCTS CO.
W.R. GRACE
GARLOCK, INC.

*James Herbert Johnson: 16216 Princeton, Detroit, MI 48221

PRODUCTS

Unibestos P/C
Kaylo P/C and Block
85% Mag. P/C and Block

85% Mag. P/C Block & Cement
7M-90 Cement

Asb. Cement
Insulating Cement
Lightweight Insulating
Castable
Insulating Cement
Lite Cast Insulating Castable
Insulag
Asb. Furnace Cement
Zonolite Insulation
Asb. Gaskets

MANUFACTURERS

PITTSBURGH CORNING
OWENS CORNING FIBERGLAS
ARMSTRONG CORK CO.
(Armstrong World Industries)
KEASBEY & MATTISON/T & N
PHILIP CAREY CO. (Celotex/
Rapid American)
GOLDBOND (National Gypsum)
A.P. GREEN REFRACTORIES

HARBISON WALKER
GREFCO (General Refractories)
GREFCO (General Refractories)
QUIGLEY CO., INC.
SURE SEAL PRODUCTS CO.
W.R. GRACE
GARLOCK, INC.



*Eugene Wilson: 12603 Pinehurst, Detroit, MI

PRODUCTS

Kaylo P/C and Block
7M-90 Cement

85% Mag. P/C, Block & Cement

Asb. Cement
Insulating Cement
Asb. Rollboard
Stic-tite Cement
Insulating Cement
Asb. Insulating and
Finishing Cements
Lite Kastite
Insulag
Asb. Furnace Cement
Zonolite Insulation
Asb. Gaskets

MANUFACTURERS

OWENS CORNING FIBERGLAS
PHILIP CAREY CO. (Celotex/
Rapid American)
JOHNS-MANVILLE
GOLDBOND (National Gypsum)
A.P. GREEN REFRACTORIES
HARBISON WALKER
COMBUSTION ENGINEERING
GREFCO (General Refractories)

PLIBRICO
CHICAGO FIRE BRICK
QUIGLEY CO., INC.
SURE SEAL PRODUCTS CO.
W.R. GRACE
GARLOCK, INC.

*James Coleman: 12772 Ilene, Detroit, MI 48238

PRODUCTS

Kaylo P/C and Block
85% Mag. P/C and Block

Asb. Cement
Insulating Cement
Lightweight Insulating
Castable
Stic-tite Cement
Asb. Insulating and
Finishing Cements
Lite Kastite
Zonolite Insulation
Asb. Gaskets
Asb. Gaskets and Packing

MANUFACTURERS

OWENS CORNING FIBERGLAS
ARMSTRONG CORK CO.
(Armstrong World Industries)
GOLDBOND (National Gypsum)
A.P. GREEN REFRACTORIES

HARBISON WALKER
COMBUSTION ENGINEERING

PLIBRICO
CHICAGO FIRE BRICK
W.R. GRACE
GARLOCK, INC.
PALMETTO (Greene, Tweed)



Robert Zackery: 5587 S. Mondale, Detroit, MI 48204

PRODUCTS

Kaylo P/C and Block
Asb. Millboard

Insulating Cement
Insulating Cement
Narcolite Insulating Castable
Lite Kastite
Zonolite Insulation
Asb. Lined Heat
Treat Furnaces

MANUFACTURERS

OWENS CORNING FIBERGLAS
PHILIP CAREY CO. (Celotex/
Rapid American)
A.P. GREEN REFRACTORIES
GREFCO (General Refractories)
NARCO (North American Ref.)
CHICAGO FIRE BRICK
W.R. GRACE

SURFACE COMBUSTION
(Midland Ross)

*Monroe Smith: 8802 E. Outer Drive, Detroit, MI 48213

PRODUCTS

Unibestos P/C
Kaylo P/C and Block
85% Mag. P/C and Block

Asb. Cement
Insulating Cement
Insulating Cement
Narcolite Insulating Castable
Lite Kastite
Zonolite Insulation
Asb. Gaskets
Asb. Lined Heat
Treat Furnaces

MANUFACTURERS

PITTSBURGH CORNING
OWENS CORNING FIBERGLAS
ARMSTRONG CORK CO.
(Armstrong World Industries)
GOLDBOND (National Gypsum)
A.P. GREEN REFRACTORIES
GREFCO (General Refractories)
NARCO (North American Ref.)
CHICAGO FIRE BRICK
W.R. GRACE
GARLOCK, INC.

SURFACE COMBUSTION
(Midland Ross)

Herbert Howard: 19956 Blackstone, Detroit, MI 48219

PRODUCTS

Kaylo P/C and Block
Asb. Cement
Insulating Cement
Asb. Rollboard
Insulating Cement
Lite Kastite
Zonolite Insulation
Asb. Gaskets
Asb. Lined Heat
Treat Furnaces

MANUFACTURERS

OWENS CORNING FIBERGLAS
GOLDBOND (National Gypsum)
A.P. GREEN REFRACTORIES
HARBISON WALKER
GREFCO (General Refractories)
CHICAGO FIRE BRICK
W.R. GRACE
GARLOCK, INC.

SURFACE COMBUSTION
(Midland Ross)

LAW OFFICES

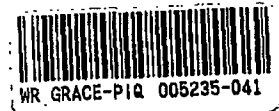
MICHAEL B. SERLING, P.C.

3 NORTH OLD WOODWARD AVE

SUITE 406

BIRMINGHAM, MICH 48009

(248) 647-6966



*James Askew: 12937 Rutland, Detroit, MI 48227
 CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Schad Boiler

PRODUCTS

Kaylo P/C and Block
 Insulating Cement
 Stic-tite Cement
 Insulating Cement
 Insulating Cement
 Lite Kastite
 Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
 A.P. GREEN REFRACTORIES
 COMBUSTION ENGINEERING
 GREFCO (General Refractories)
 NARCO (North American Ref.)
 CHICAGO FIRE BRICK
 W.R. GRACE

*Willie Whitlock: 15833 North Lawn, Detroit, MI 48238
 CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Schad Boiler

PRODUCTS

Kaylo P/C and Block
 85% Mag. P/C and Block

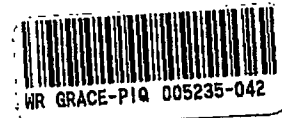
 7M-90 Cement

 85% Mag. P/C, Block & Cement
 Insulating Cement
 Asb. Rollboard
 Stic-tite Cement
 Insulating Cement
 Insulating Cement
 Asb. Block Insulation
 Asb. Insulating and
 Finishing Cements
 Lite Kastite
 Brikset
 Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
 ARMSTRONG CORK CO.
 (Armstrong World Industries)
 PHILIP CAREY CO. (Celotex/
 Rapid American)
 JOHNS-MANVILLE
 A.P. GREEN REFRACTORIES
 HARBISON WALKER
 COMBUSTION ENGINEERING
 GREFCO (General Refractories)
 NARCO (North American Ref.)
 PLIBRICO

 PLIBRICO
 CHICAGO FIRE BRICK
 CHICAGO FIRE BRICK
 W.R. GRACE



*Eddie Berry: 11704 Livernois, Apt. #1, Detroit, MI 48024
CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
FURNACES: Schad Boiler

PRODUCTS

Kaylo P/C and Block
85% Mag. P/C and Block

7M-90 Cement

85% Mag. P/C, Block & Cement
Insulating Cement
Asb. Rollboard
Stic-tite Cement
Insulating Cement
Insulating Cement
Asb. Block Insulation
Asb. Insulating and
Finishing Cements
Lite Kastite
Brikset
Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
ARMSTRONG CORK CO.
(Armstrong World Industries)
PHILIP CAREY CO. (Celotex/
Rapid American)
JOHNS-MANVILLE
A.P. GREEN REFRACTORIES
HARBISON WALKER
COMBUSTION ENGINEERING
GREFCO (General Refractories)
NARCO (North American Ref.)
PLIBRICO

PLIBRICO
CHICAGO FIRE BRICK
CHICAGO FIRE BRICK
W.R. GRACE



James Malloy: 3336 Glendale, Detroit, MI 48238
CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
FURNACES: Schad Boiler

PRODUCTS

Kaylo P/C and Block
85% Mag. P/C and Block

7M-90 Cement

85% Mag. P/C, Block & Cement
Insulating Cement
Asb. Rollboard
Stic-tite Cement
Insulating Cement
Insulating Cement
Asb. Block Insulation
Asb. Insulating and
Finishing Cements
Lite Kastite
Brikset
Zonolite Insulation
Asb. Gaskets
Asb. Gaskets and Packing
Asb. Gaskets and Packing
Asb. Gaskets and Packing

MANUFACTURERS

OWENS CORNING FIBERGLAS
ARMSTRONG CORK CO.
(Armstrong World Industries)
PHILIP CAREY CO. (Celotex/
Rapid American)
JOHNS-MANVILLE
A.P. GREEN REFRACTORIES
HARBISON WALKER
COMBUSTION ENGINEERING
GREFCO (General Refractories)
NARCO (North American Ref.)
PLIBRICO

PLIBRICO
CHICAGO FIRE BRICK
CHICAGO FIRE BRICK
W.R. GRACE
GARLOCK, INC.
ANCHOR PACKING COMPANY
PALMETTO (Greene, Tweed)
ARGO PACKING



*"Doc" Sylvester: 490 Campbell, River Rouge, MI 48218
CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
FURNACES: Schad Boiler

PRODUCTS

Kaylo P/C and Block
85% Mag. P/C and Block

7M-90 Cement

85% Mag. P/C, Block & Cement
Insulating Cement
Asb. Rollboard
Stic-tite Cement
Insulating Cement
Insulating Cement
Asb. Block Insulation
Asb. Insulating and
Finishing Cements
Lite Kastite
Brikset
Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
ARMSTRONG CORK CO.
(Armstrong World Industries)
PHILIP CAREY CO. (Celotex/
Rapid American)
JOHNS-MANVILLE
A.P. GREEN REFRACTORIES
HARBISON WALKER
COMBUSTION ENGINEERING
GREFCO (General Refractories)
NARCO (North American Ref.)
PLIBRICO

PLIBRICO
CHICAGO FIRE BRICK
CHICAGO FIRE BRICK
W.R. GRACE



*Lindel White: 1677 Myron, Lincoln Park, MI 48146
 CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Schad Boiler

PRODUCTS

Kaylo P/C and Block
 7M-90 Cement

Asb. Millboard
 Asb. Paper
 K-FAC Asb. Block Insulation
 Insulating Cement
 Sk-7 & KS4 Gunning Refractory
 Asb. Lined Firebrick
 Asb. Rollboard
 Stic-tite Cement
 Insulating Cement
 Insulating Cement
 Asb. Block Insulation
 Asb. Insulating and
 Finishing Cements
 Lite Kastite
 Brikset
 Insulag
 Asb. Refractory Cement
 Asb. Mastics
 Zonolite Insulation
 Asb. Gaskets
 Asb. Gaskets
 Asb. Gaskets and Packing
 Asb. Gaskets and Packing
 Asb. Gaskets and Packing
 Asb. Insulated Pumps
 Asb. Wrapped/Lined
 Turbines and Generators
 Asb. Wrapped/Lined Boilers

MANUFACTURERS

OWENS CORNING FIBERGLAS
 PHILIP CAREY CO. (Celotex/
 Rapid American)
 RUBEROID CO. (Gaf)
 RUBEROID CO. (Gaf)
 UNITED STATES GYPSUM
 A.P. GREEN REFRACTORIES
 A.P. GREEN REFRACTORIES
 HARBISON WALKER
 HARBISON WALKER
 COMBUSTION ENGINEERING
 GREFCO (General Refractories)
 NARCO (North American Ref.)
 PLIBRICO

PLIBRICO
 CHICAGO FIRE BRICK
 CHICAGO FIRE BRICK
 QUIGLEY CO., INC.
 SURE SEAL PRODUCTS CO.
 AMCHEM PRODUCTS CO.
 W.R. GRACE
 FLEXITALLIC
 GARLOCK, INC.
 ANCHOR PACKING COMPANY
 PALMETTO (Greene, Tweed)
 ARGO PACKING
 INGERSOLL-RAND
 GENERAL ELECTRIC
 BABCOCK & WILCOX



*Wesley Shelton: Route 1, Box 393, Corbin, Kentucky 40701
 CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Schad Boiler

PRODUCTS

Kaylo P/C and Block
 7M-90 Cement

Asb. Millboard
 Asb. Paper
 Insulating Cement
 Sk-7 & KS4 Gunning Refractory
 Asb. Lined Firebrick
 Asb. Rollboard
 Stic-tite Cement
 Insulating Cement
 Insulating Cement
 Asb. Block Insulation
 Asb. Insulating and
 Finishing Cements
 Lite Kastite
 Brikset
 Insulag
 Asb. Mastics
 Zonolite Insulation
 Asb. Gaskets
 Asb. Gaskets
 Asb. Gaskets and Packing
 Asb. Gaskets and Packing
 Asb. Gaskets and Packing
 Asb. Insulated Pumps
 Asb. Wrapped/Lined
 Turbines and Generators
 Asb. Wrapped/Lined Boilers

MANUFACTURERS

OWENS CORNING FIBERGLAS
 PHILIP CAREY CO. (Celotex/
 Rapid American)
 RUBEROID CO. (Gaf)
 RUBEROID CO. (Gaf)
 A.P. GREEN REFRACTORIES
 A.P. GREEN REFRACTORIES
 HARBISON WALKER
 HARBISON WALKER
 COMBUSTION ENGINEERING
 GREFCO (General Refractories)
 NARCO (North American Ref.)
 PLIBRICO

PLIBRICO
 CHICAGO FIRE BRICK
 CHICAGO FIRE BRICK
 QUIGLEY CO., INC.
 AMCHEM PRODUCTS CO.
 W.R. GRACE
 FLEXITALLIC
 GARLOCK, INC.
 ANCHOR PACKING COMPANY
 PALMETTO (Greene, Tweed)
 ARGO PACKING
 INGERSOLL-RAND

GENERAL ELECTRIC
 BABCOCK & WILCOX



John Franklin: 38731 Sturbridge, Sterling Heights, MI 48310
 CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Schad Boiler

PRODUCTS

Kaylo P/C and Block
 7M-90 Cement

Asb. Millboard
 Asb. Paper
 Insulating Cement
 Sk-7 & KS4 Gunning Refractory
 Asb. Lined Firebrick
 Asb. Rollboard
 Stic-tite Cement
 Insulating Cement
 Insulating Cement
 Asb. Block Insulation
 Asb. Insulating and
 Finishing Cements
 Lite Kastite
 Brikset
 Insulag
 Asb. Mastics
 Zonolite Insulation
 Asb. Gaskets
 Asb. Gaskets and Packing
 Asb. Gaskets and Packing
 Asb. Gaskets and Packing
 Asb. Wrapped/Lined
 Turbines and Generators
 Asb. Wrapped/Lined Boilers

MANUFACTURERS

OWENS CORNING FIBERGLAS
 PHILIP CAREY CO. (Celotex/
 Rapid American)
 RUBEROID CO. (Gaf)
 RUBEROID CO. (Gaf)
 A.P. GREEN REFRACTORIES
 A.P. GREEN REFRACTORIES
 HARBISON WALKER
 HARBISON WALKER
 COMBUSTION ENGINEERING
 GREFCO (General Refractories)
 NARCO (North American Ref.)
 PLIBRICO

PLIBRICO
 CHICAGO FIRE BRICK
 CHICAGO FIRE BRICK
 QUIGLEY CO., INC.
 AMCHEM PRODUCTS CO.
 W.R. GRACE
 GARLOCK, INC.
 ANCHOR PACKING COMPANY
 PALMETTO (Greene, Tweed)
 ARGO PACKING

GENERAL ELECTRIC
 BABCOCK & WILCOX



James McComb: 6918 Davidson, Orchard Lake, MI 48033
 CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Schad Boiler

PRODUCTS

Kaylo P/C and Block
 Insulating Cement
 Stic-tite Cement
 Insulating Cement
 Insulating Cement
 Asb. Insulating and
 Finishing Cements
 Lite Kastite
 Insulag
 Zonolite Insulation
 Asb. Gaskets
 Asb. Gaskets and Packing
 Asb. Gaskets and Packing
 Asb. Gaskets and Packing
 Asb. Wrapped/Lined
 Turbines and Generators
 Asb. Wrapped/Lined Boilers

MANUFACTURERS

OWENS CORNING FIBERGLAS
 A.P. GREEN REFRACTORIES
 COMBUSTION ENGINEERING
 GREFCO (General Refractories)
 NARCO (North American Ref.)

 PLIBRICO
 CHICAGO FIRE BRICK
 QUIGLEY CO., INC.
 W.R. GRACE
 GARLOCK, INC.
 ANCHOR PACKING COMPANY
 PALMETTO (Greene, Tweed)
 ARGO PACKING

 GENERAL ELECTRIC
 BABCOCK & WILCOX

*John Myers: 37775 Oakview Lane, Apt. L6, Westland, MI 48185
 CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Coon DeVisser; Brown Insulation

PRODUCTS

Kaylo P/C and Block
 85% Mag. P/C and Block

 85% Mag. P/C, Block & Cement

 85% Mag. P/C, Block & Cement
 85% Mag. P/C, Block & Cement
 Calsilite P/C and Block
 7M Cement

MANUFACTURERS

OWENS CORNING FIBERGLAS
 ARMSTRONG CORK CO.
 (Armstrong World Industries)
 KEASBEY & MATTISON/T & N/
 FEDERAL-MOGUL
 JOHNS-MANVILLE
 MUNDET CORK (Crown Cork & Seal)
 RUBEROID CO. (Gaf)
 RUBEROID CO. (Gaf)

LAW OFFICES
 MICHAEL B. SERLING, P.C.
 10 NORTH OLD WOODWARD AVE
 SUITE 406
 BIRMINGHAM, MICH 48009
 (248) 647-6966



*James Bondy, Sr.: 36626 Thinbark, Wayne, MI 48184
 CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Coon DeVisser; Brown Insulation

PRODUCTS

Kaylo P/C and Block
 85% Mag. P/C and Block

 85% Mag. P/C, Block & Cement

 85% Mag. P/C, Block & Cement
 85% Mag. P/C, Block & Cement
 Calsilite P/C and Block
 7M Cement
 Asb. Mastics
 Asb. Mastics

MANUFACTURERS

OWENS CORNING FIBERGLAS
 ARMSTRONG CORK CO.
 (Armstrong World Industries)
 KEASBEY & MATTISON/T & N/
 FEDERAL-MOGUL
 JOHNS-MANVILLE
 MUNDET CORK (Crown Cork & Seal)
 RUBEROID CO. (Gaf)
 RUBEROID CO. (Gaf)
 AMCHEM PRODUCTS
 FLINTKOTE

*Robert Tilley: 1133 East Woodpecker Lane, Hernando, FL 32642
 CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Coon DeVisser; Brown Insulation

PRODUCTS

Kaylo P/C and Block
 85% Mag. P/C and Block

 85% Mag. P/C, Block & Cement

 85% Mag. P/C, Block & Cement
 85% Mag. P/C, Block & Cement
 Calsilite P/C and Block
 7M Cement
 Asb. Mastics
 Asb. Mastics

MANUFACTURERS

OWENS CORNING FIBERGLAS
 ARMSTRONG CORK CO.
 (Armstrong World Industries)
 KEASBEY & MATTISON/T & N/
 FEDERAL-MOGUL
 JOHNS-MANVILLE
 MUNDET CORK (Crown Cork & Seal)
 RUBEROID CO. (Gaf)
 RUBEROID CO. (Gaf)
 AMCHEM PRODUCTS
 FLINTKOTE